

Former Plainwell Impoundment Time-Critical Removal Action Weekly Construction Update

Progress Report #26—November 5, 2007

Work Completed: October 25-October 31, 2007

- Began excavating soil and sediment at Removal Area 7.
- Continued dewatering and operation of the 500 gallon per minute treatment system at the Phase 1 Cofferdam Area. Temporarily stopped the dewatering operation to install an additional bag filter bank and fine-grain media to sand filters to improve the removal of suspended solids.
- Continued excavating soil and sediment from the Phase 1 Cofferdam Area.
- Continued loading and transporting solidified non-TSCA material from Staging Areas 3S and 5S to Allied Waste's C&C landfill in Marshall, Michigan. Continued solidifying excavated soil and sediment from the Phase 1 Cofferdam Area at Staging Areas 3S and 5S.
- Continued surveying and performing sampling and analysis of excavated portions of Removal Area 7 and the Phase 1 Cofferdam Area.
- Continued constructing templates at the water control structure (WCS) to guide the installation of H-piles.
- Continued turbidity monitoring of the Kalamazoo River to support removal activities.

Estimated Weekly Volume Hauled to TSCA and Non-TSCA Landfill Facilities				
Date	Estimated Quantity TSCA-material (cubic yards)	Number of Truck Loads TSCA-material	Estimated Quantity Non-TSCA material (cubic yards)	Number of Truck Loads Non-TSCA material
Weekly Total	0	0	945	27
Total to Date	2,345	67	20,755	593

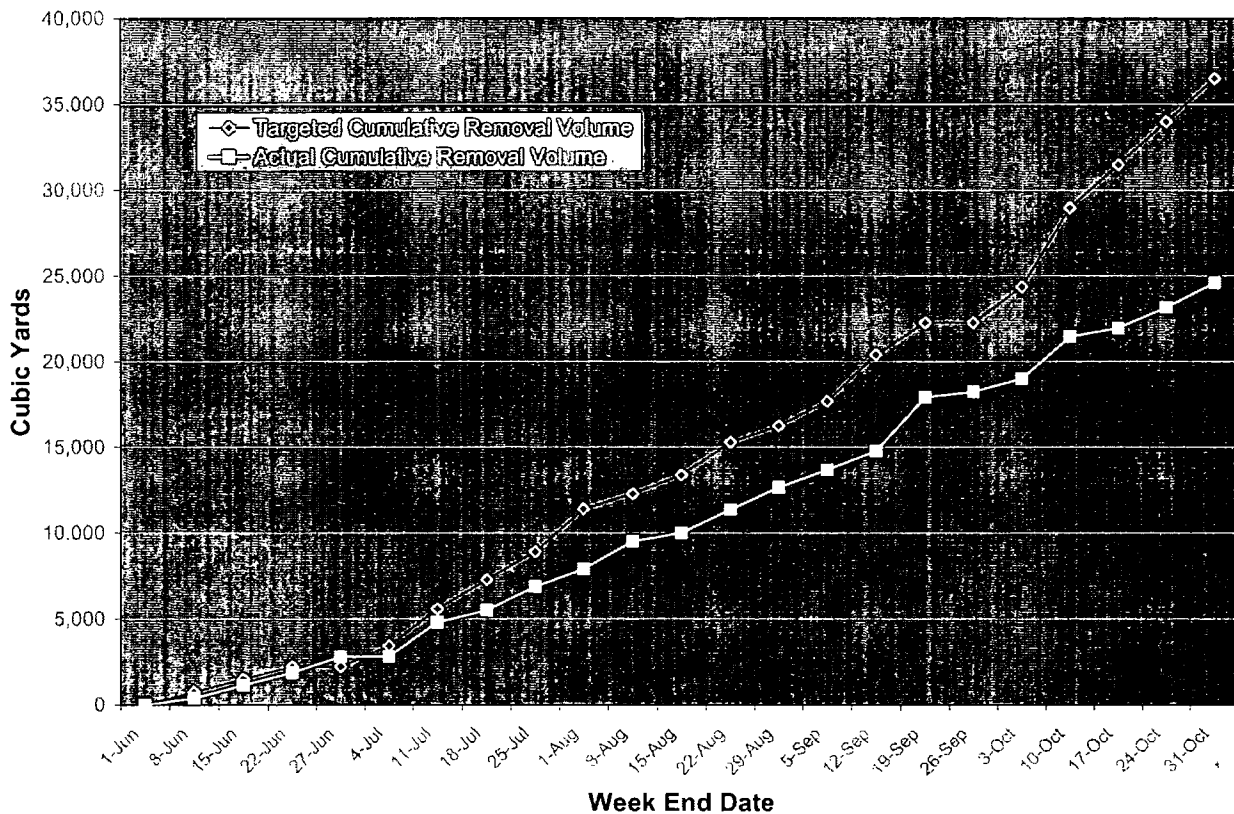
** All values are unofficial, estimated quantities, subject to revision/verification.



Work Planned: November 1-November 7, 2007

- Continue excavating soil and sediment at Removal Area 7.
- Continue dewatering at the Phase 1 Cofferdam Area. Resume operation of the 500 gallon per minute treatment system after the installation of the additional bag filter bank and a fine-grain media to sand filters.
- Complete excavating soil and sediment from the Phase 1 Cofferdam Area.
- Continue loading and transporting solidified non-TSCA material from Staging Areas 3S and 5S to Allied Waste's C&C landfill in Marshall, Michigan. Continue solidifying excavated soil and sediment from the Phase 1 Cofferdam Area at Staging Areas 3S and 5S.
- Continue surveying and performing sampling and analysis of excavated portions of Removal Area 7 and the Phase 1 Cofferdam Area.
- Complete template construction and H-pile installation at the water control structure. Complete the addition of bracing to a portion of the WCS.
- Continue turbidity monitoring of the Kalamazoo River to support removal activities.

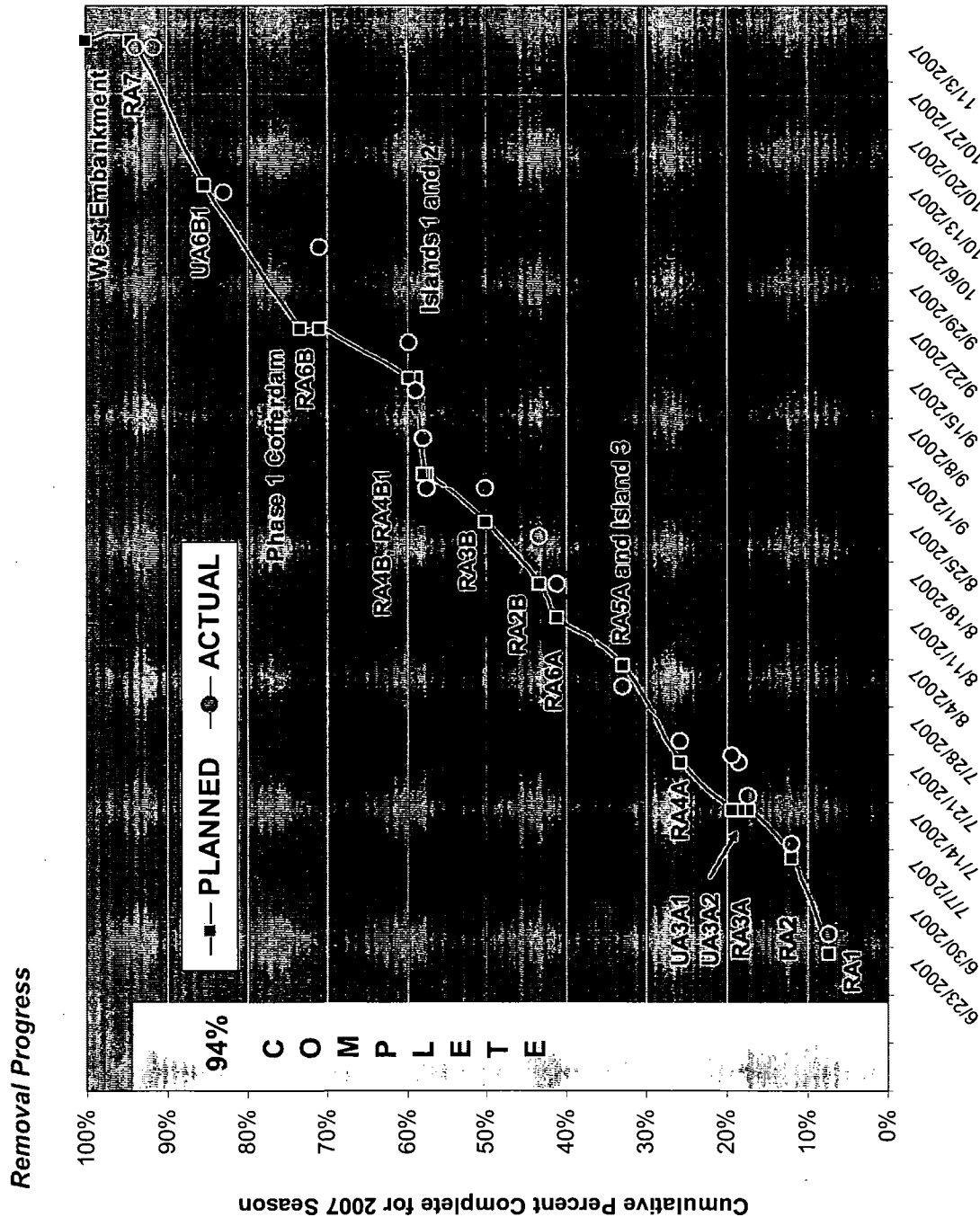
Removal Progress



Notes

Targeted volumes are neat and subject to change due to additional excavation done at request of USEPA.

Actual volumes removed are below the targeted volumes potentially due to the conservative estimation methodology used to develop targeted figures and due to the actual topographic conditions encountered at the site, which could result in smaller volumes needing to be removed than originally estimated. The targeted volumes have been increased by 10% to account for additional material that could be removed as a result of over-excavation and additional removal in response to confirmation sampling. Soil/sediment removal activities are on schedule based on the ARCADIS BBLES 4/30/07 Plainwell TCRA Construction Schedule.



Health & Safety Update

- 4 Loss Prevention Observations (LPOs) were completed this week. A total of 78 LPOs have been completed for the project to date.
- At the request of the project team, Consumers Energy has temporarily de-energized the overhead power lines at the Plainwell Dam to enhance the safety and productivity of excavation activities at the Phase 1 Cofferdam Area.

Weather Summary

- The C&C Landfill has continued to operate with a reduced capacity to accept non-TSCA project waste due to wet conditions at their facility.

Environmental Monitoring and Construction Quality Assurance Testing

Resuspension/Turbidity Monitoring:

Testing Performed this Week? No ☐ Yes ☒
Exceedances? N/A ☐ No ☒ Yes ☐ If yes, explain:

Dewatering System Discharge Monitoring:

Discharge Flow: 1,016,000 gallons
Testing Performed this Week? No ☐ Yes ☒
Exceedances? N/A ☐ No ☐ Yes ☒ If yes, explain: *On October 26, 2007, laboratory analysis indicated a sample collected at Monitoring Point 004A exceeded the maximum daily discharge of 45 mg/L of total suspended solids (TSS) with a TSS concentration of 53 mg/L. To improve solids removal in the treatment system, the treatment system has been shut down so that a second bank of bag filters and a finer-grain media in the sand filters.*

Excavation Verification Sampling:

Testing Performed this Week? No ☒ Yes ☐ in Removal Area(s):
Cleanup Standard Achieved? N/A ☒ Yes ☐ No ☐ If no, explain:

Issues Encountered/Solutions Advanced

- None.

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Equipment on Site

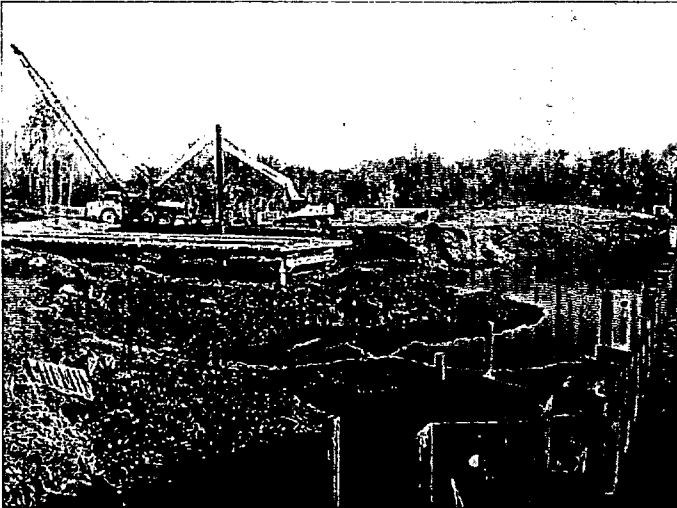
Equipment	10/25/07	10/26/07	10/27/07	10/28/07	10/29/07	10/30/07	10/31/07
Komatsu PC-300 Excavator	2	2	2	2	2	2	2
Komatsu PC-300 HD Long Reach	1	1	1	1	1	1	1
Komatsu PC-200 Excavator	1	1	1	1	1	1	1
John Deere JD-50 Mini-Excavator	2	2	2	2	2	2	2
John Deere JD-450 Dozer	1	1	1	1	1	1	1
John Deere JD-700 Dozer	1	1	1	1	1	1	1
Komatsu D37 Dozer	1	1	1	1	1	1	1
Komatsu D61 Dozer	1	1	1	1	1	1	1
Komatsu D65 Dozer	1	1	1	1	2	2	1
Volvo P-180 Loader	1	1	1	1	1	1	1
Komatsu 380 loader	1	1	1	1	1	1	1
CAT 328 Loader (King)	1	1	1	1	1	1	1
American 80-ton Crane (King)	1	1	1	1	1	1	1
2,000 Gallon Water Truck	1	1	1	1	1	1	1
Komatsu 400 Articulating Dump Truck	2	2	2	2	2	2	2

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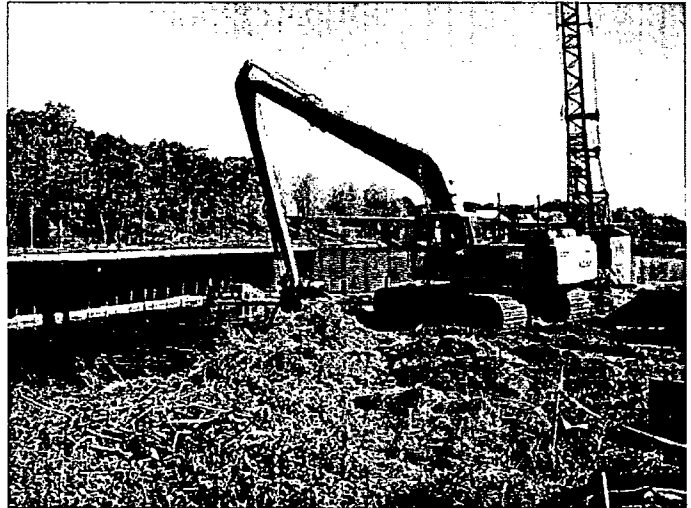
Personnel, Regulatory Staff, and Visitors on Site

Individual/Affiliation	10/25/07	10/26/07	10/27/07	10/28/07	10/29/07	10/30/07	10/31/07
Terra Contracting Staff	20	20	10		20	20	20
Sam Borries/USEPA							
Mike Ribordy/USEPA OSC					X	X	
Lori Muller/USEPA					X	X	
Craig Thomas/USEPA					X	X	
Paul Bucholtz/MDEQ	X					X	
John Bradley/MDEQ							
Bree Bennett/MDEQ						X	
Jeff Spruit/MDEQ						X	
Mark DuCharme/MDEQ						X	
John Lerg/MDNR							
Weston Contractors	1	1			1	1	1
CDM Contractors		1			1		
Chase Fortenberry/KRSG							
Paul Montney/KRSG							
Mark Tapp/KRSG							
Mark Brown/KRSG							
Steve Garbaciak/ARCADIS BBL							
Steve Montagna/ARCADIS BBL							
Adam Chwalibog/ARCADIS BBL	X	X			X	X	X
Eric Hritsuk/ARCADIS BBL					X	X	
Rich Price/ARCADIS BBLES	X						
Matt Bowman/ARCADIS BBLES							
EJ Suardini/ARCADIS BBLES	X	X			X	X	X
Mike Kohagen/ARCADIS BBLES	X	X	X		X	X	X
Mark Otto/ARCADIS BBLES	X	X					
Michelle Rumler/ARCADIS BBL					X	X	X
Joe Willoughby/ARCADIS BBLES	X	X			X	X	X
Nick Harmer/ARCADIS BBL					X	X	X
<i>Other Subcontractors (Specify)</i>							
Schrader (Treatment System)	1	1	1	1	1	1	1
King Construction (WCS/cofferdam)	4	4					4

Photos from Week #26



*Excavating and hauling soil and sediment
at the Phase 1 Cofferdam Area.*



Excavating sediment at Removal Area 7B.

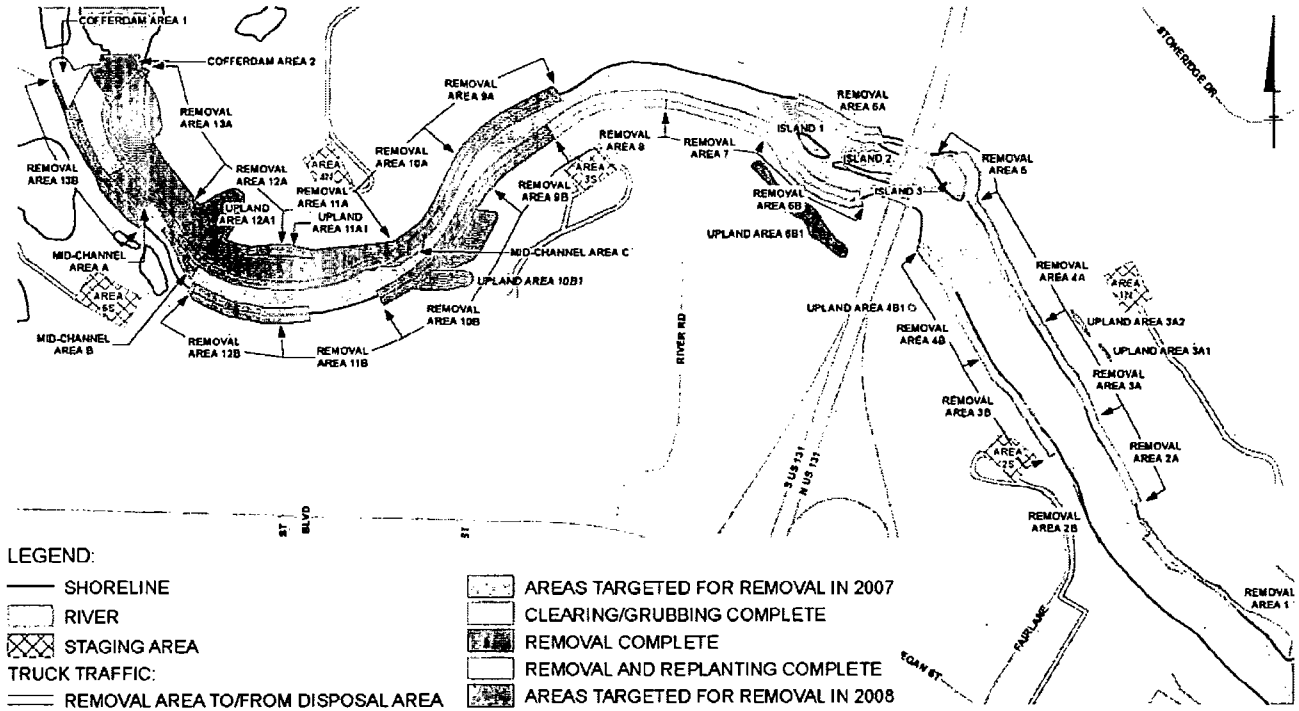


Placing and grading topsoil material at Upland Area 6B1.



Material processing operations at Staging Area 5S.

Targeted Removal Areas—Former Plainwell Impoundment



Notes

Additional planting in 'Removal and Replanting Complete' areas may be necessary in 2008.

All dimensions and features represented on this map are approximate. Actual locations of access roads and staging areas and final boundaries of removal areas will be determined at the time of construction.

Mike Ribordy /R5/USEPA/US
11/26/2007 12:34 PM

To "Garbaciak, Steve" <Steve.Garbaciak@arcadis-us.com>
cc "Barnett, Bonnie A." <Bonnie.Barnett@dbi.com>, Eileen
Furey/R5/USEPA/US@EPA, 'Mellonie Fleming'
<MSFlemin@GAPAC.com>, SAMUEL
bcc
Subject Re: Plainwell TCRA- notice of mobilization completion

Steve,

U.S. EPA is providing written notice that all Work associated with mobilization at the Former Plainwell Impoundment in Plainwell, Michigan has been completed. This notice is being provided pursuant to Paragraph 39.b.1. of the Administrative Settlement Agreement and Order of Consent for Removal Action (Docket No. V-W-07-C-863). Thanks

Mike Ribordy, On-Scene Coordinator
U.S. Environmental Protection Agency

"Garbaciak, Steve" <Steve.Garbaciak@arcadis-us.com>



"Garbaciak, Steve"
<Steve.Garbaciak@arcadis-us.com>
11/20/2007 04:28 PM

To Mike Ribordy/R5/USEPA/US@EPA
cc SAMUEL BORRIES/R5/USEPA/US@EPA, Eileen
Furey/R5/USEPA/US@EPA, "Barnett, Bonnie A."
<Bonnie.Barnett@dbi.com>, 'Mellonie Fleming'
<MSFlemin@GAPAC.com>

Subject Plainwell TCRA- notice of mobilization completion

Mike:

Paragraph 39.b.1. of the Administrative Settlement Agreement and Order of Consent for Removal Action (Docket No. V-W-07-C-863), requires the KRSG to seek written notice from the United States Environmental Protection Agency (USEPA) that all Work associated with mobilization at the Former Plainwell Impoundment in Plainwell, Michigan has been completed. Upon receipt of this notice, a cost summary and certification can be provided by KRSG and payment can then be received from USEPA in accordance with the order. Can you please confirm, through a reply to this message, that mobilization at the site has been completed? Thanks.

Steve

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